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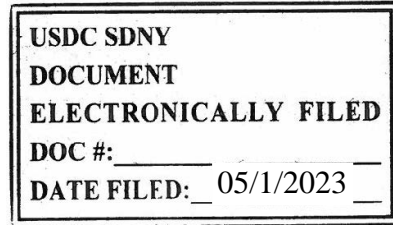
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April 28, 2023

VIA ECF

Honorable Sarah Netburn
Thurgood Marshall Courthouse
40 Foley Square, Room 430
Southern District of New York
New York, New York 10007-1312



**Re: Emergency Physician Services of New York, et al., v. UnitedHealth Group, Inc., et al.,
Case No. 1:20-cv-09183 – Letter re Parties’ April 28 Update on Defendants’ Motion
at ECF No. 374**

Dear Judge Netburn,

The undersigned submit this joint letter on behalf of the Parties in the above-referenced matter. On April 24, 2023, the Parties submitted a joint letter updating the Court on “whether the issues raised in Defendants’ motion at ECF No. 374 have been addressed.” (ECF No. 426.) Defendants informed the Court that the Parties would submit a subsequent joint letter after Defendants had an opportunity to review Plaintiffs’ Friday, April 21, 2023 productions (*id.*), which the Court endorsed (*id.*).

Defendants’ Position. TeamHealth Plaintiffs’ April 21 productions consist of approximately 80 total documents covering approximately 94 pages, most of which are duplicates of documents previously produced, but many of which are unique documents that fill some gaps in prior productions. While Defendants remain concerned about TeamHealth Plaintiffs’ overly narrow responsiveness criteria in making productions, and cannot know what documents they have not produced, Defendants are satisfied that this production is adequate to respond to Defendants’ Motion to Compel at ECF No. 374.

Plaintiffs’ Position. Provider Plaintiffs’ position remains the same as the position expressed in the joint status letter dated April 24, 2023. (ECF No. 424.) We are pleased that this issue has been resolved.

Respectfully submitted,

/s/ Sarah Dowd

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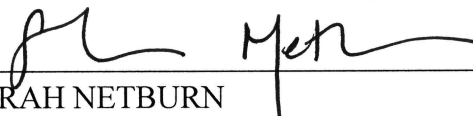
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Counsel for Defendants

Because the parties have represented that the issues raised in Defendants' March 21, 2023 letter have been resolved, the Court respectfully asks the Clerk of Court to terminate the motion at ECF No. 374.

SO ORDERED.



SARAH NETBURN
United States Magistrate Judge

Dated: May 1, 2023
New York, New York